

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWN HOLBROOK, on behalf of)	
himself and all others similarly situated)	
)	Case No. 08 CV 385
Plaintiff,)	
)	Judge St. Eve
v.)	
)	Magistrate Judge Keys
MARRIOTT INTERNATIONAL, INC.,)	
)	
Defendant.)	

**AGREED MOTION FOR ENTRY OF JOINT STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

Plaintiff Shawn Holbrook and Defendant Marriott International Inc. (“Defendant” or “Marriott”), pursuant to Fed. R. Civ. P. 26(c), respectfully move the Court for entry of the attached Joint Stipulated Confidentiality Agreement and Protective Order. *See* Exhibit A. In support of their motion, the parties state as follows:

1. Plaintiff’s discovery requests seek production of non-publicly available documents or information relating to the conduct of Defendant’s business of a sensitive and/or proprietary nature, including operational details and information regarding Defendant’s policies, practices, and business strategy.
2. To maintain the confidentiality of the information, counsel for Plaintiff and Defendant conferred and agreed to seek entry of the attached Joint Stipulated Confidentiality Agreement and Protective Order. The parties have agreed to the language in the attached Order.
3. Accordingly, the parties respectfully request that this Court enter the attached Order to provide certain minimal protections to Defendant with regard to their production of confidential documents to Plaintiff.

WHEREFORE, the parties respectfully request that this Court enter the attached Joint Stipulated Confidentiality and Protective Order.

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April 16, 2008

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CERTIFICATE OF SERVICE

I, Colin Connor, an attorney, do hereby certify that I have caused a true and correct copy of the foregoing *Agreed Motion for Entry of Joint Stipulated Confidentiality and Protective Order* to be electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following on this 16th day of April, 2008:

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